

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Soren Stevenson,

Civ. No. 20-2007 (SRN/TNL)

Plaintiff,

v.

Benjamin Bauer, acting in his individual capacity as a Minneapolis Police Officer, *et al.*,

Defendants.

---

**PLAINTIFF'S MEET AND CONFER STATEMENT**

I, Robert Bennett, one of the attorneys representing Plaintiff Soren Stevenson in this matter, hereby certify that the following events occurred in attempts to foster meaningful settlement discussions with counsel for the Defendants, Kristin Sarff, Esq., regarding the issues raised in Plaintiff's Motion:

1. Shortly after Soren decided to accept the Clarified Rule 68 Offer, Kathryn (Katie) Bennett and I undertook to scrutinize the initial billings. We exercised our billing judgment as expeditiously as possible and, per Ms. Sarff's request, on February 28, 2022, Katie Bennett provided the requested finalized fees and costs, via email, along with a letter explaining we produced them only for use under Rule 408 of the Federal Rules of Evidence. See Exhibit 9 to my Declaration.
2. On March 11, 2022, having heard no response, I emailed Ms. Sarff to notify her and the Defendants that we resumed work on the supporting

documentation required for Plaintiff's Motion. As one can tell from the filings, this was no small task and one in which the Plaintiff bears the burden of proof. Ms. Sarff responded that our work "may likely be unnecessary." She further explained: "The 142-page draft bill is lengthy and our review isn't finished. That is the only reason why you have (sic) received a specific response." See Attached at Tab A.

3. On March 17, 2022, still having heard no response, I again emailed Ms. Sarff explaining the need for continued work on the Motion and supporting documentation due the continued lack of response. See also *id.*
4. On March 18, 2022, Ms. Sarff and I spoke by telephone. There was some discussion that a response would be forthcoming from the Defendants by March 25, 2022. I again explained to Ms. Sarff that we had no choice but to continue moving forward with the Motion in the absence of any response to our documented fees or any offer from the Defendants.
5. March 18 was the last conversation on the matter of fees and costs. Despite providing our billing records in February and it now being April, the Defendants have made no offer in an attempt to negotiate a resolution of the fees or even respond to the billing records we provided more than five weeks ago.

Dated: April 4, 2022

**ROBINS KAPLAN LLP**



Robert Bennett, #6713  
Andrew J. Noel, #322118  
Kathryn H. Bennett, #0392087  
Marc E. Betinsky, #0388414  
800 LaSalle Ave, Suite 2800  
Minneapolis, MN 55402  
Telephone: 612-349-8500  
[rbennett@robinskaplan.com](mailto:rbennett@robinskaplan.com)  
[anoel@robinskaplan.com](mailto:anoel@robinskaplan.com)  
[kbennett@robinskaplan.com](mailto:kbennett@robinskaplan.com)  
[mbetinsky@robinskaplan.com](mailto:mbetinsky@robinskaplan.com)

*Attorneys for Plaintiff Soren Stevenson*